

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

-----X  
THE NEW YORK TIMES COMPANY  
and CHARLIE SAVAGE,

Plaintiffs,

v.

UNITED STATES DEPARTMENT OF  
JUSTICE,

Defendant.  
-----X

STIPULATION OF VOLUNTARY  
DISMISSAL

17 Civ. 1946 (PKC)

WHEREAS, on or about March 16, 2017, Plaintiffs The New York Times Company and Charlie Savage ("Plaintiffs") filed a complaint in the above-captioned matter (the "Complaint");

WHEREAS, the Complaint alleges claims against the United States Department of Justice arising under the Freedom of Information Act ("FOIA");

NOW, THEREFORE, IT IS HEREBY STIPULATED AND AGREED, by and between the parties and their counsel, that:

1. Pursuant to Fed. R. Civ. P. 41(a)(1)(A)(ii), Plaintiffs voluntarily dismiss all claims against the United States Department of Justice, without costs or attorneys' fees to either the Plaintiffs or Defendant the United States Department of Justice; and
2. This Stipulation may be signed in counterparts.

Dated: July 30, 2018  
New York, New York

DAVID E. MCCRAW, ESQ.  
Attorney for the Plaintiffs



---

By: DAVID E. MCCRAW, ESQ.  
Legal Department  
The New York Times Company  
620 8th Avenue, 18th Floor  
New York, NY 10018  
Phone: (212) 556-4031  
Fax: (212) 556-1009  
Email: mccrad@nytimes.com

Dated: July 30 2018  
New York, New York

GEOFFREY S. BERMAN  
United States Attorney for the Southern  
District of New York  
Attorney for Defendant the United States  
Department of Justice



---

By: REBECCA S. TINIO  
Assistant United States Attorney  
86 Chambers Street, 3<sup>rd</sup> Floor  
New York, New York 10007  
Tel.: (212) 637-2774  
Fax: (212) 637-2702  
Email: rebecca.tinio@usdoj.gov